

Exhibit 7

Exhibit 7

Matthew T. Wise

From: Ragatzki, Stephen M. <Ragatzki@millercanfield.com>
Sent: Friday, October 8, 2021 2:19 PM
To: Matthew T. Wise; Infante, Joseph M.; Guikema, Marchall A.; Gregory M. Meihn
Cc: Gartman, Christopher J.; Katie R. Johnson; Shannon K. Breznai
Subject: RE: WOMP - Peninsula Twp. - Notices of Taking Depositions [MCPS-ACTIVE.FID2611943]
Attachments: Notice of Taking Deposition Isaiah Wunsch - WOMP(38227968.2).pdf; Notice of Taking Deposition Randy Mielnik - WOMP 10.28.21 3 p.m.(38228717.1).pdf; Notice of Taking Deposition Brad Bickle - WOMP 11.1 9 a.m.(38228048.1).pdf; Re-Notice of Taking Deposition Becky Chown - WOMP 11.2 after Wahl(38228040.1).pdf; Re-Notice of Taking Deposition Rob Manigold - WOMP 10.28 9 a.m.(38228031.1).pdf; Re-Notice of Taking Deposition Dave Sanger - WOMP 10.28 after Manigold(38228030.1).pdf; Re-Notice of Taking Deposition Christina Deeren - WOMP 10.29 9 a.m.(38228025.1).pdf; Notice of Taking Deposition Gordon Hayward - WOMP 10.29 after Deeren(38228023.1).pdf; Notice of Taking Deposition Warren Wahl - WOMP 11. 2 9 a.m.(38228020.1).pdf; Notice of Taking Deposition Margaret Achorn - WOMP 11.2 after Chown(38228019.1).pdf; Re-Notice of Taking Deposition Greg Meihn - WOMP 11.9 9 a.m.(38228012.1).pdf; Ltr to OPC Regarding Deposition Topics for Peninsula Township(38230120.1).pdf
Follow Up Flag: Follow up
Flag Status: Completed

Matt,

We will identify some dates for the requested individuals and our expert witness early next week. I've also attached deposition notices with tentative dates for the following people:

Rob Manigold (Oct. 28)
Dave Sanger (Oct 28)
Randy Mielnik (Oct. 28)
Christina Deeren (Oct. 29)
Gordan Hayward (Oct. 29)
Brad Bickle (Nov. 1)
Isaiah Wunsch (Nov. 1)
Warren Wahl (Nov. 2)
Becky Chown (Nov. 2)
Margaret Achorn (Nov. 2)
Greg Meihn (Nov. 9)

If these dates do not work, we can certainly reschedule on mutually agreeable dates. Finally, I have attached a letter identifying deposition topics for the Township according to the order in ECF No. 94. It is our assumption that these topics are likely to be divided among the witnesses we have already named. Please identify for us which witness or witnesses will address the various topics. If you are going to designate a witness we have not noticed, please let us know.

Thanks,
Steve

Stephen M. Ragatzki | Associate

Miller Canfield

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From: Matthew T. Wise <mwise@foleymansfield.com>

Sent: Friday, October 8, 2021 10:20 AM

To: Infante, Joseph M. <infante@millercanfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foleymansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foleymansfield.com>; Shannon K. Breznai <sbreznai@foleymansfield.com>

Subject: RE: WOMP - Peninsula Twp. - Notices of Taking Depositions [MCPS-ACTIVE.FID2611943]

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Joe, given that we have been unable to resolve this matter thus far and have a deadline coming up, please provide deposition dates for the individuals we have requested previously so that we can get those scheduled immediately. We would also like to depose the expert you disclosed as well, so please provide your availability for the same. Should we not hear from you promptly, we will begin noticing the depositions in light of the impending discovery cut-off. Thanks.



Matthew T. Wise | Partner | T: 248-721-8152 | F: 248-721-4201

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From: Matthew T. Wise

Sent: Monday, August 23, 2021 5:25 PM

To: 'Infante, Joseph M.' <infante@millercanfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foleymansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foleymansfield.com>; Shannon K. Breznai <sbreznai@foleymansfield.com>

Subject: RE: WOMP - Peninsula Twp. - Notices of Taking Depositions [MCPS-ACTIVE.FID2611943]

Assume you mean September 9 and 10, not August. We need to nail down soon—do you want to send me a proposed list based upon the deponents we have both requested and then can make final confirmations presuming we agree/everyone is available, etc.?

From: Infante, Joseph M. <infante@millercanfield.com>

Sent: Monday, August 23, 2021 4:51 PM

To: Matthew T. Wise <mwise@foyleymansfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foyleymansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foyleymansfield.com>; Shannon K. Breznai <sbreznai@foyleymansfield.com>

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Matt

August 9 and 10 are now open for me. When do you want to discuss nailing down specific dates for specific deponents?

Joseph M. Infante | Attorney and Counselor at Law

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infante@millercanfield.com | View Profile + VCard

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From: Infante, Joseph M.

Sent: Monday, August 9, 2021 3:56 PM

To: Matthew T. Wise <mwise@foyleymansfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foyleymansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foyleymansfield.com>; Shannon K. Breznai <sbreznai@foyleymansfield.com>

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Matt, see below for my open dates. Should we check these dates with our clients and see who can fit in where?

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From: Matthew T. Wise <mwise@foyleymansfield.com>

Sent: Friday, August 6, 2021 5:00 PM

To: Infante, Joseph M. <infante@millercanfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foyleymansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foyleymansfield.com>; Shannon K. Breznai <sbreznai@foyleymansfield.com>

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Joe, I have the following blocks of 2-3 as you suggest, please advise as to what you may have so we can hopefully coordinate:

August 25-26; (open)
September 1-2; (conflict)
September 8-10; (only available the 8th)
September 15-16; (open)
September 21-23 (open)

I am still working to confirm availability of the witnesses you requested for these dates, but per our agreement, we can discuss that when we have dates.

Thanks.



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From: Matthew T. Wise <mwise@foleymansfield.com>

Sent: Thursday, August 5, 2021 1:18 PM

To: Infante, Joseph M. <infante@millercanfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foleymansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foleymansfield.com>; Shannon K. Breznai <sbreznai@foleymansfield.com>

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I'm ok with that plan and will get back to you after looking at the calendar.

You are correct on Greg.

Sent from my Sprint Samsung Galaxy S10.

----- Original message -----

From: "Infante, Joseph M." <infante@millercanfield.com>

Date: 8/5/21 12:30 PM (GMT-05:00)

To: "Matthew T. Wise" <mwise@foleymansfield.com>, "Guikema, Marchall A." <guikema@millercanfield.com>, "Gregory M. Meihn" <gmeihn@foleymansfield.com>

Cc: "Gartman, Christopher J." <Gartman@millercanfield.com>, "Ragatzki, Stephen M." <Ragatzki@millercanfield.com>, "Katie R. Johnson" <kjohnson@foleymansfield.com>, "Shannon K. Breznai" <sbreznai@foleymansfield.com>
Subject: RE: WOMP - Peninsula Twp. - Notices of Taking Depositions [MCPS-ACTIVE.FID2611943]

I think we will need two weeks to get through all of the depositions. How about we look at our calendars between now and the end of September and exchange dates where we can have blocks of 2-3 days in a row? Once we have those blocks identified we can figure out which deponents fit into each block. It may be two of yours and three of mine or vice versa. Sounds okay?

On Greg, are you objecting altogether to his deposition? If so I will get together a motion to compel to get that process started.


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From: Matthew T. Wise <mwise@foleymansfield.com>
Sent: Thursday, August 5, 2021 11:51 AM
To: Infante, Joseph M. <infante@millercanfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foleymansfield.com>
Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foleymansfield.com>; Shannon K. Breznai <sbreznai@foleymansfield.com>
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I am still waiting on availability from our witnesses, but am in the process and of course am cognizant of our fact witness deposition deadline of September 2. With what will amount to upwards of 15 depositions, do we want to discuss 30 days extra for the fact witness depositions only without moving any other dates (given that discovery itself is open until November)? Then, we could arrange a week or two in early September and get it solid on the books to get through everything and perhaps allow the possibility the Court may decide some of the pending motions (PTP intervention and your MSJ) in the interim? Thoughts?



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From: Infante, Joseph M. <infante@millercanfield.com>

Sent: Thursday, August 5, 2021 11:47 AM

To: Matthew T. Wise <mwise@foylemansfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foylemansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foylemansfield.com>; Shannon K. Breznai <sbreznai@foylemansfield.com>

Subject: RE: WOMP - Peninsula Twp. - Notices of Taking Depositions [MCPS-ACTIVE.FID2611943]

Matt, is there a certain timeframe you are looking to do these depositions? Discovery ends at the end of August so if we are going to get them in within the deadline we need to move quickly. If you are looking to go into September we should discuss that as well.

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From: Matthew T. Wise <mwise@foylemansfield.com>

Sent: Wednesday, August 4, 2021 5:15 PM

To: Infante, Joseph M. <infante@millercanfield.com>; Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foylemansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foylemansfield.com>; Shannon K. Breznai <sbreznai@foylemansfield.com>

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We will propose additional dates as soon as possible and like you, have reached out for the same. Thanks.



Matthew T. Wise | Partner |

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From: Infante, Joseph M. <infante@millercanfield.com>

Sent: Wednesday, August 4, 2021 5:07 PM

To: Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foylemansfield.com>; Matthew T. Wise <mwise@foylemansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie

R. Johnson <kjohnson@foleymansfield.com>; Shannon K. Breznai <sbreznai@foleymansfield.com>

Subject: Re: WOMP - Peninsula Twp. - Notices of Taking Depositions [MCPS-ACTIVE.FID2611943]

Also, if the dates I scheduled do not work please propose alternate dates. With discovery ending soon I needed to notice them but will work with you on mutually agreeable dates.

Sent from my Verizon, Samsung Galaxy smartphone

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From: Infante, Joseph M. <infante@millercanfield.com>

Sent: Wednesday, August 4, 2021 5:05:47 PM

To: Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foleymansfield.com>; Matthew T. Wise <mwise@foleymansfield.com>

Cc: Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foleymansfield.com>; Shannon K. Breznai <sbreznai@foleymansfield.com>

Subject: Re: WOMP - Peninsula Twp. - Notices of Taking Depositions [MCPS-ACTIVE.FID2611943]

Matt, you should connect with Greg. He and I discussed this and when I informed him that I would be scheduling these depositions he said he understood. There is no basis to demand I withdraw the depotion notices. As for my clients, I have been collecting available dates today and will have dates for you tomorrow for those depositions.

Sent from my Verizon, Samsung Galaxy smartphone

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From: Matthew T. Wise <mwise@foleymansfield.com>

Sent: Wednesday, August 4, 2021 4:52:09 PM

To: Guikema, Marchall A. <guikema@millercanfield.com>; Gregory M. Meihn <gmeihn@foleymansfield.com>

Cc: Infante, Joseph M. <infante@millercanfield.com>; Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>; Katie R. Johnson <kjohnson@foleymansfield.com>; Shannon K. Breznai <sbreznai@foleymansfield.com>

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Joe, please withdraw these deposition notices. We have asked for deposition dates for your people since mid-May and heard nothing from you. We also previously noticed your clients' representatives for depositions and agreed to hold off as resolution efforts were made. To now unilaterally notice these depositions after we exchanged correspondence just yesterday about getting dates is unacceptable and against the understanding we believed to have reached. If you do not desire to work out mutually agreeable dates, which we are happy to do with the exception of the deposition of Mr. Meihn, we will be filing a Motion immediately. Thanks.



Matthew T. Wise | Partner |

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From: Guikema, Marchall A. <guikema@millercanfield.com>
Sent: Wednesday, August 4, 2021 2:41 PM
To: Gregory M. Meihn <gmeihn@foleymansfield.com>; Matthew T. Wise <mwise@foleymansfield.com>
Cc: Infante, Joseph M. <infante@millercanfield.com>; Gartman, Christopher J. <Gartman@millercanfield.com>; Ragatzki, Stephen M. <Ragatzki@millercanfield.com>
Subject: WOMP - Peninsula Twp. - Notices of Taking Depositions [MCPS-ACTIVE.FID2611943]

Please see attached Notices of Taking Depositions along with our Certificate of Service. Thank you.

Marchall A. Guikema | Legal Assistant to Robert L. DeJong,
Joseph M. Infante, Christopher J. Gartman, and Steve Ragatzki
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